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By ECF

Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Grant Berman, et al.*
S2 03 Cr. 308 (LAK)

Dear Judge Kaplan:

We write on behalf of our client, Grant Berman, who is currently on bail in connection with the above-captioned matter, to request permission for Mr. Berman to travel outside of the country during the weeks of April 21, 2014 and April 28, 2014 for business purposes. Mr. Berman has been on bail in this matter since 2003, more than 10 years ago. His sentencing date is scheduled for July 23, 2014.

Mr. Berman resides in San Diego, California, and is an owner of a manufacturing business with a factory only a few miles over the border in Mexico. It is currently the height of the business' production season, and a client of the Mr. Berman's business has requested that Mr. Berman accompany him on visits to the plant as production commences on this client's products. Because of the plant's close proximity to the border, Mr. Berman will return to the United States every day and will not spend a night in Mexico.

We sought consent from Assistant U.S. Attorney Alexander Wilson yesterday, but have not yet been able to reach him. Because of our client's desire to travel next week, however, we are requesting the Court's permission today before hearing back from the Government. Accordingly, we respectfully request Your Honor's permission for Mr. Berman to travel to Mexico with prior notice to his Probation Officer during the weeks of April 21, 2014 and April 28, 2014.

Respectfully submitted,

/s/ Daniel S. Ruzumna
Daniel S. Ruzumna

cc: AUSA Alexander Wilson